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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

MOTION TO FILE UNDER SEAL

(Filed *Ex Parte*)

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
22 Local Civil Rule 5.6 for leave to file under seal Plaintiffs' Amended Proposed Scheduling
23 Order: Common Benefit Fees and Expense Reimbursement ("Proposed Scheduling
24 Order").

25 The Amended Proposed Scheduling Order contains confidential information
26 relating to procedures affecting all Participating Counsel as defined in Case Management
27 Order No. 6 (Doc. 372). Furthermore, as the Court is undoubtedly aware, all filings
28

1 related to the Common Benefit Fee and Cost Committee have been filed under seal in this
2 litigation. Accordingly, good cause exists for sealing the Exhibit.

3 RESPECTFULLY SUBMITTED this 26th day of April 2021.

4 BEUS GILBERT MCGRODER PLLC

5 By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Kelly White